

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$879,643.00 IN
U.S. CURRENCY,

15 ASSORTED MONEY ORDERS VALUED
16 AT \$6,000.00 IN U.S. CURRENCY,

17 Defendants.
18

2:21-MC-00097-MCE-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimants Maria
20 Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective
21 counsel, as follows:

22 1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the
23 administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the
24 Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S.
25 Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

26 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
28 ///

1 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
2 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
5 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
6 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
7 That deadline was April 2, 2021.

8 4. By Stipulation and Order filed April 12, 2021, the parties stipulated to extend to July 1,
9 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11 5. By Stipulation and Order filed July 21, 2021, the parties stipulated to extend to August 30,
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

14 6. By Stipulation and Order filed August 31, 2021, the parties stipulated to extend to
15 September 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
17 forfeiture.

18 7. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to
19 November 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
21 forfeiture.

22 8. By Stipulation and Order filed December 6, 2021, the parties stipulated to extend to
23 January 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
25 forfeiture.

26 9. By Stipulation and Order filed February 4, 2022, the parties stipulated to extend to March
27 29, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
28 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

1 10. By Stipulation and Order filed March 31, 2022, the parties stipulated to extend to May 27,
2 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
3 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

4 11. By Stipulation and Order filed May 27, 2022, the parties stipulated to extend to July 26,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

7 12. By Stipulation and Order filed July 28, 2022, the parties stipulated to extend to September
8 23, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10 13. By Stipulation and Order filed September 27, 2022, the parties stipulated to extend to
11 October 24, 2022, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
13 forfeiture.

14 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
15 to December 23, 2022, the time in which the United States is required to file a civil complaint for
16 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
17 subject to forfeiture.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 15. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to December 23, 2022.

4 Dated: 10/20/2022

PHILLIP A. TALBERT
United States Attorney

5
6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

7
8 Dated: 10/20/2022

/s/ Kenneth Rosenfeld
KENNETH ROSENFELD
Attorney for potential claimant
Maria Gonzalez Sanchez


9
10
11 Dated: 10/20/2022

/s/ Allen N. Sawyer
ALLEN N. SAWYER
Attorney for potential claimant
Jose Luis Mendoza Castillo

(Signatures authorized by email)

12
13
14
15 **IT IS SO ORDERED.**

16
17 DATED: October 24, 2022

18
19 
20 MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE